

UNITED STATES OF AMERICA : **CRIMINAL NO. 2:18-CR-124-2**

v. :

ALBERT WILLIAM UPSHUR :

Now comes the United States of America, by and through its undersigned attorneys, and respectfully moves for an order permitting the filing of upcoming joint status reports under seal. On March 19, 2019, the Court ordered the parties to file monthly status reports beginning April 30, 2019. Because the status reports will discuss matters that the Court has previously placed under seal, the government respectfully requests leave to file the status reports discussing such matters under seal.

UNITED STATES OF AMERICA
Richard E. Zuckerman
Principal Deputy Assistant Attorney General

By: /s/ Jeffrey Bender
JEFFREY B. BENDER
KATHRYN SPARKS
Trial Attorneys
U.S. Department of Justice
Tax Division, Criminal Enforcement Section
601 D Street, N.W., 7th Floor
Washington, DC 20005
(202) 305-4077
(202) 616-1786 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on the 29th of April, 2019, I caused a copy of the foregoing to be delivered via electronic filing to all parties registered with ECF in this matter.

By: /s/ Jeffrey Bender
JEFFREY B. BENDER
Trial Attorney
U.S. Department of Justice